

# **EXHIBIT A**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

YI HUEY KUO,

Plaintiff

- against -

TRAVCO INSURANCE COMPANY,

Defendant.

Index #

**COMPLAINT**

Plaintiff, YI HUEY KUO, by her attorneys, the LAW OFFICE OF CRAIG A. BLUMBERG, as and for her complaint sets forth as follows:

1. Plaintiff, YI HUEY KUO, is an individual over the age of eighteen years and is an owner of the property located at 8165 Dongan Avenue, Elmhurst, New York, 11373.
2. Defendant, TRAVCO INSURANCE COMPANY, is a corporation domiciled in the State of Connecticut, and authorized to do the business of insurance in New York and having its principal place of business at One Tower Square, Hartford, CT 06183 .
3. At all relevant times, plaintiff was the owner of the property located at 8165 Dongan Avenue, Elmhurst, New York, 11373 (the "Premises").
4. At all relevant times, plaintiff had an insurable interest in the Dwelling, Personal Property and Loss of Use at the Premises.
5. On or around May 4, 2015, defendant for good and valuable consideration made and issued to plaintiff a certain policy of insurance bearing Policy #988466620 633 1, for the period of May 4, 2015, through May 4, 2016, wherein and whereby it insured plaintiff for all risks of loss set forth therein for the Premises known as 8165 Dongan Avenue, Elmhurst, New York,

11373 . With respect to the Dwelling plaintiff was insured up to an amount of \$500,000, with respect to Personal Property plaintiff was insured up to an amount of \$350,000, and with respect to Loss of Use plaintiff was insured up to an amount of \$150,000.

6. On or about February 15, 2016, while said policy was in full force and effect, plaintiff suffered a water loss at the Premises.

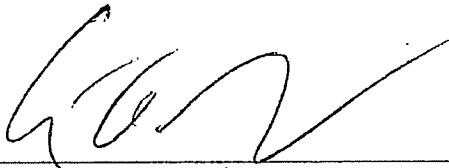
7. Plaintiff suffered damages to the dwelling in the amount of \$99,704.73 for building damage and \$19,101.18 for emergency services, personal property damage in the amount of \$45,489.06, for a total loss of at least \$164,294.97.

8. Defendant has failed to pay plaintiff for the damages, although duly demanded, and issued a denial letter dated March 28, 2016.

9. Such refusal is in breach of the contract of insurance.

WHEREFORE, plaintiff demands judgment against defendant in the amount of at least \$164,294.97, with interest from February 15, 2016, together with such other, further and different relief as to the court may appear justified under the circumstances, and the costs and disbursements of this action.

Dated: New York, New York  
June 2, 2016



CRAIG A. BLUMBERG  
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**NYCRR 130-1.1 CERTIFICATION**

CRAIG A. BLUMBERG, affirms under the penalties of perjury, that I have no knowledge that the substance of this submission is false, and that the contentions are not frivolous as defined in subsection (c) of section 130-1.1.



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**SUMMONS AND COMPLAINT**

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